

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

JUAN CARLOS LÓPEZ ET. AL.

Plaintiffs,

vs.

**MANZANA LLC;
LAWRENCE WILLIAMS; and
RONALD RASCH FARMS LLC**

Defendants

Civil No. 17-1154(WGY)

**STIPULATED JOINT MOTION FOR EXTENSION OF DEADLINES AND TO
INFORM TENTATIVE SETTLEMENT AGREEMENT**

TO THE HONORABLE COURT:

COME NOW, Plaintiffs and Defendants, through the undersigned counsel, and respectfully allege and pray:

1. The parties have reached a settlement agreement in principle, subject to final client approval (for both parties) of the terms of the *Confidential Settlement Agreement and Release* to be drafted and executed by the parties. The parties are in the process of exchanging drafts of the referenced *Confidential Settlement Agreement and Release* but have not been able to finalize it because of logistical limitations associated with the large number of Plaintiffs who are not all easily reached and delays associated with the holidays.

2. Upon executing a *Confidential Settlement Agreement and Release*, Plaintiffs would be filing a motion for voluntary dismissal of all claims with prejudice.

3. To protect the parties' rights and interests in the unlikely event that final approval of the *Confidential Settlement Agreement and Release* cannot be obtained, the

parties respectfully request that, in light of the above, the Court extend the current December 31, 2018 written discovery deadline (see Docket No. 44) to February 28, 2019 and grant the parties a 60-day term to finalize the *Confidential Settlement Agreement and Release* (which we anticipate will take some time given the circumstances of both parties) and thus for Plaintiffs to file the corresponding voluntary dismissal.

4. This Motion is filed as a joint stipulated motion with all counsel for the parties concurring in the Motion and requested relief.

WHEREFORE, it is respectfully requested that this Honorable Court extend the current December 31, 2018 written discovery deadline (see Docket No. 44) to February 28, 2019 and grant the parties a 60-day term to finalize the *Confidential Settlement Agreement and Release*.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th day of December, 2018.

WE HEREBY CERTIFY that on this date, we have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

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